

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:)	
)	Chapter 9
)	
CITY OF DETROIT, MICHIGAN,)	Case No. 13-53846
)	
Debtor.)	Judge Thomas J. Tucker
)	
_____)	

**STIPULATION FOR THE ENTRY OF AN ORDER MODIFYING THIS
COURT’S AUGUST 26, 2016 ORDER (DOCKET NUMBER 11491)**

The City of Detroit, Michigan (“City”), AFSCME Council 25 and Its Affiliated Detroit Locals (“AFSCME”) and the Coalition of Detroit Unions (“Coalition”) stipulate and agree as follows:

A. On February 21, 2014, AFSCME filed proof of claim 2958 (“AFSCME Claim”) which was comprised of 20 components. On that same date, the Coalition filed proof of claim 2851 (“Coalition Claim”).

B. On May 29, 2015, this Court entered its Order Regarding Further Proceedings on the City of Detroit’s Objections to Proof of Claim Number 2851 Filed by the Coalition of Detroit Unions and to the Proof of Claim Number 2958 Filed by Michigan AFSCME Council 25 and Its Affiliated Detroit Locals (Doc. No. 9900).

C. On July 19, 2015, this Court entered the Order Modifying the Court's May 29, 2015 Order Regarding Further Proceedings on the City of Detroit's Objections to Proof of Claim Number 2581 Filed by the Coalition of Detroit Unions, and to the Proof of Claim Number 2958 filed by Michigan AFSCME Council 25 and its Affiliated Detroit Locals (Doc. No. 10071).

D. On September 30, 2015, this Court entered the Order Modifying Order Modifying the Court's May 29, 2015 Order Regarding Further Proceedings on the City of Detroit's Objections to Proof of Claim Number 2581 Filed by the Coalition of Detroit Unions, and to the Proof of Claim Number 2958 Filed by Michigan AFSCME Council 25 and its Affiliated Detroit Locals (Doc. No. 10219).

E. On November 25, 2015, this Court entered the Order Modifying This Court's September 30, 2015 Order (Doc. No. 10286).

F. On January 29, 2016, this Court entered the Order Modifying This Court's November 25, 2015 Order (Doc. No. 10740).

G. On April 29, 2016, this Court entered the Order Modifying This Court's January 29, 2016 Order (Doc. No. 11133).

H. On June 27, 2016, this Court entered the Order Modifying This Court's April 29, 2016 Order (Doc. No. 11326).

I. On August 26, 2016, this court entered the Order Modifying This Court's June 27, 2016 Order (Doc. No. 11491) ("Order").

After the entry of the Order, the parties continued their productive discussions regarding the resolution of the Coalition Claim and the AFSCME Claim and the parties have agreed to the terms of a complete settlement of the AFSCME Claim and the Coalition Claim. The City has obtained approval of the settlement by the City Council. The parties are currently working to finalize a stipulation and proposed Order for approval of the compromise, which the parties anticipate will be filed in the next two weeks. A component of the settlement is the resolution of proofs of claim filed by individual union members and other unions that the City asserts are duplicative of the claims asserted in the AFSCME Claim and the Coalition Claim. AFSCME and the Coalition have requested additional time to provide such claimants with notice of this resolution. As such, the parties request that the Court provide them with an additional fourteen days to finalize and file the stipulation.

NOW, THEREFORE, the City, AFSCME and the Coalition stipulate and agree as follows:

1. The filing deadlines in paragraph 1.A of the Order are extended from October 28, 2016 to November 14, 2016.
2. The filing deadlines in paragraph 1.B of the Order are extended from December 27, 2016 to January 10, 2017.

3. The filing deadlines in paragraph 1.C of the Order are extended from January 27, 2017 to February 10, 2017.

4. The filing deadlines in paragraph 1.D of the Order are extended from November 8, 2016 to November 22, 2017.

SO STIPULATED:

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ATTORNEYS FOR THE CITY

DATED: October 27, 2016

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**ORDER MODIFYING THIS COURT’S AUGUST 26, 2016 ORDER
(DOCKET NUMBER 11491)**

This case is before the Court on the stipulation filed on October 17, 2016 entitled “Stipulation for the Entry of an Order Modifying this Court’s August 26, 2016 Order (Docket Number 11491)” (Docket No. [], the “Stipulation”). Based on the Stipulation,

IT IS ORDERED THAT the Court’s August 26, 2016 Order entitled “Order Modifying This Court’s June 27, 2016 Order (Doc. No. 11491)” (the “Order”) is modified as follows:

1. The filing deadlines in paragraph 1.A of the Order are extended from October 28, 2016 to November 14, 2016.
2. The filing deadlines in paragraph 1.B of the Order are extended from December 27, 2016 to January 10, 2017.

3. The filing deadlines in paragraph 1.C of the Order are extended from January 27, 2017 to February 10, 2017.

4. The filing deadlines in paragraph 1.D of the Order are extended from November 8, 2016 to November 22, 2017.